DOCUMENT RESUME

ED 134 793 CE 009 881

AUTHOR	Anderson, Robert; Rozansky, Rosa D.
TITLE	The Impact of CETA on Institutional Vocational Education. An Update, 1976.
INSTITUTION	National League of Cities, Washington, D.C.; United States Conference of Mayors, Washington, D. C.
SPONS AGENCY	National Advisory Council on Vocational Education, Washington, D.C.
REPORT NO	NACVE-030-77
PUB DATE	Jul 76
CONTRACT	300-75-0340
NOTE	71p.; For a related document see CE 009 880
EDRS PRICE	MF-$0.83 HC-$3.50 Plus Postage.
DESCRIPTORS	*Cooperative Planning; Disadvantaged Groups; Educational Legislation; *Employment Programs; Federal Programs; Federal State Relationship; *Program Administration; *Program Effectiveness; State Agencies; *State Aid; Surveys; *Vocational Education
IDENTIFIERS	CETA; *Comprehensive Employment and Training Act

ABSTRACT

After noting that the study results of the Comprehensive Employment and Training Act's (CETA) first year of operation commented on the issue of cooperative efforts between CETA prime sponsors and the vocational education system, the study of CETA's second year of implementation reexamined the same issue using the 100 prime sponsors who were queried in the original study ("The Impact of CETA on Institutional Vocational Education"). Seventy-four percent responded. Some of the conclusions from analyzing responses were (1) over 50% of the prime sponsors included in this study reported more effective working relationships with their respective vocational education communities in FY 1976, (2) improved working relationships generally did not result in increased CETA title I funding of institutional vocational education, (3) the allowable uses of the 5% vocational education funds are still causing problems between prime sponsors and vocational education in negotiating nonfinancial agreements, (4) differences in philosophy and the continuation of turf protection are the largest coordination problems that exist at the local level between the vocational education system and the CETA system, and (5) the main local incentive for increased coordination between the vocational education community and CETA prime sponsors is "CETA money." This report discusses the rationale of the survey design, analysis of survey responses (which covers program administration, program operations, and program coordination), and conclusions. The appendixes include the legislative update, list of cities included in the analysis, survey instrument, and the signature sheet and instructions for completing the nonfinancial agreement. (HD)

Documents acquired by ERIC include many informal unpublished materials not available from other sources. ERIC makes every effort to obtain the best copy available. Nevertheless, items of marginal reproducibility are often encountered and this affects the quality of the microfiche and hardcopy reproductions ERIC makes available via the ERIC Document Reproduction Service (EDRS). EDRS is not responsible for the quality of the original document. Reproductions supplied by EDRS are the best that can be made from the original.

ED134793

AN UPDATE 1976

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY

THE IMPACT OF CETA ON INSTITUTIONAL VOCATIONAL EDUCATION

CE009881

2

NATIONAL LEAGUE OF CITIES
UNITED STATES CONFERENCE OF MAYORS
1620 Eye Street, N.W., Washington, D.C. 20006 202/293-7300

Alan Beals
Executive Vice President
NATIONAL LEAGUE OF CITIES

John Gunther
Executive Director
U. S. CONFERENCE OF MAYORS

Robert Anderson, Director of Manpower
Rosa D. Rozansky, Senior Staff Assistant

July, 1976

This report was prepared under Contract Number 300-75-0340 between the National Advisory Council on Vocational Education and the National League of Cities and U. S. Conference of Mayors. Any opinions or points of view stated in the publication do not necessarily represent the official position of the National Advisory Council on Vocational Education.

CONTENTS

	PAGE
INTRODUCTION	1
RATIONALE OF THE SURVEY DESIGN	5
ANALYSIS	7
A. Introduction	7
B. Program Administration	11
1. State Administration of the Five Percent Funds	13
2. Prime Sponsor Administration	25
C. Program Operations	27
1. Recruitment and Placement, Determination of Occupational Needs	31
2. Where CETA-Funded Vocational Education Takes Place	33
3. Types of CETA Training	37
4. Supportive Services	39
D. Program Coordination	41
CONCLUSIONS	47
APPENDIX I	51
Legislative Update	53
APPENDIX II	57
List of Cities Included in Analysis	59
Survey	61
APPENDIX III	67
Signature Sheet and Instructions for Completing Non-Financial Agreements	69

INTRODUCTION

In December, 1974, the NLC and USCM produced a report for the National Advisory Council on Vocational Education entitled the The Impact of CETA on Institutional Vocational Education, based on CETA's first year in operation. The issue of cooperative efforts between CETA prime sponsors and the vocational education system was new and relatively untalked about at that time. The findings of that study concluded that during that first year of CETA implementation:

- CETA was not significantly impacting on institutional vocational education; at best the system was merely being maintained as it existed under MDTA and EOA.
- There existed a great deal of confusion and lack of understanding among local prime sponsors about the system of institutional vocational education due to the lack of direct involvement prior to CETA.
- The communications between states and local prime sponsors needed for CETA to impact positively on the provision of institutional vocational education was inadequate.
- CETA Title I money was not being used to any large extent to increase the training being provided at existing vocational education institutions.
- The system of negotiating non-financial agreements with the state for the provision of vocational education training and

services through the use of the five percent supplemental vocational education funds often did not afford local prime sponsors adequate flexibility.

- The CETA rules and regulations were vague regarding allocation of the five percent supplemental vocational education funds within the states.
- The confusion, complexity, and restriction of local prime sponsor flexibility had resulted in frustration among many local prime sponsors which made it difficult for the five percent supplemental vocational education funds to impact in local jurisdictions.

The issue of CETA/vocational education cooperation has become a popular one since our initial study. Meetings, panel discussions, and training sessions have taken place. These have been helpful in bringing together those concerned with both the CETA and vocational education system and giving them a forum for learning philosophies and exchanging thoughts.

Based on the findings of our initial study and the growing popularity of the issue, the National Advisory Council on Vocational Education again contracted with NLC and USCM to reexamine the situation in FY 1976 and publish an updated report on CETA's second year of implementation. Data were collected from responses to a survey which was mailed to prime sponsors at the end of December, 1975 (see Appendix II for copy of survey document). The 100 prime sponsors who were queried in the original study were contacted again and asked to

participate in this update. Seventy-four percent responded (see Appendix II for list of respondents). Out of the 74 respondents, 43 are members of a consortium arrangement. Because NLC and USCM constituents are Mayors and municipalities, each of the prime sponsors selected for inclusion in this study is either an individual city prime sponsor or a member of a consortium arrangement with a principal city included in the multi-jurisdictional arrangement. From those responses, from conversations, and from meetings with some of the actors involved in the CETA process, we have put together this document. Some of the conclusions arrived at from analyzing responses are as follows:

- Over 50 percent of the prime sponsors included in this study reported more effective working relationships with their respective vocational education communities in FY 1976.
- Improved working relationships generally did not result in increased CETA Title I funding of institutional vocational education.
- The allowable uses of the five percent vocational education funds still are causing problems between prime sponsors and vocational educators in negotiating non-financial agreements.
- Differences in philosophy and the continuation of turf protection are the largest coordination problems that exist at the local level between the vocational education system and the CETA system.
- The main local incentive for increased coordination between

the vocational education community and CETA prime sponsors is "CETA money."

Prior to CETA, local elected officials had no part to play in the vocational education system. However, CETA has provided a role to local elected officials in that they, as prime sponsors, must determine whether or not to fund vocational education activities out of their basic Title I grants.

In addition, each prime sponsor receives a share of a five-percent supplemental vocational education appropriation that is part of a special grant to Governors to provide vocational education training and services to prime sponsors in each state. Upon notification of the funds available to a state, the Governor is required to inform the state vocational education department and each prime sponsor of the amount of funds to be spent in their respective planning area. Each prime sponsor then must plan for the expenditure of its local share of five percent funds and negotiate a non-financial agreement with the state for the delivery of training and services. The final agreement is termed non-financial because prime sponsors do not physically receive their share of the funds; the state itself contracts for the training and services negotiated in the agreement.

RATIONALE OF THE SURVEY DESIGN

The survey document used to collect data for this report was designed as a tool for updating The Impact of CETA on Institutional Vocational Education. Because the issue of CETA/vocational education coordination is such a key one, some of the questions on the survey were designed to determine if progress is being made in that area. The following is a section by section explanation of the construction of the survey.

Section I of the survey document simply asks prime sponsors to identify themselves and to indicate whether or not they are members of a consortium arrangement.

Section II is concerned with basic program administration. The questions are structured to examine the amount of funds available to the CETA prime sponsors included in this study for institutional vocational education and to examine state administration of the five percent vocational education funds. Also, questions were included to collect the necessary data for a comparative analysis of the number of slots and enrollees funded by CETA in both FY 1975 and FY 1976. The issue of administrative costs was found to be very controversial in FY 1976. This section again looks at that issue and discusses it from an updated perspective.

Section III of the survey document is entitled "Program Operations." Its purpose was to collect information on the substance of vocational education offerings funded through CETA in each of the included prime sponsor jurisdictions. Also, this section was used to

prepare a comparative analysis of which institutions are providing CETA-funded classroom training in FY 1976 as compared with FY 1975.

The last section of the survey deals with the issue of program coordination. Questions are structured to determine whether working relationships between CETA prime sponsors and those institutions that provide vocational education had become more effective, less effective, or had remained the same in FY 1976 as compared with FY 1975. Prime sponsors were asked to indicate incentives applied locally to improve coordination. They also were asked to identify specific problems that make coordination with the vocational education community a complexity.

ANALYSIS

A. Introduction

FY 1976 brought with it a new level of awareness and sophistication to all those involved in the CETA process and to all those who wished to play a part in the CETA process. CETA has become to many a large resource that should solve a host of problems created by an economy in trouble. Prime sponsors have had to choose priorities as they relate to human need. The luxury of a slow maturation process was not afforded to CETA prime sponsors. Unemployment rates soared and people needed jobs and job skills quickly. In that climate of crisis, talk of cooperative efforts between CETA and vocational education grew. It seemed, and still seems, logical that in times of great human need, forces should be joined to solve common problems. There is evidence in the responses received from prime sponsors that relationships in many instances have improved and in almost all instances have at least not deteriorated, which in itself is worthy of mention in hard pressed economic times. However, it was discovered in tabulating data that improved relationships do not necessarily result in increased funding of institutions providing classroom training. Proper coordination, however, can make for a harmonious local situation and alleviation of duplication of efforts. The cooperation issue has gained recognition, but despite the increasing rhetoric around the issue of coordinating CETA and vocational education activities and despite the efforts of those individuals involved

in planning and operating skill training programs, there are a number of problems which must be solved before a melding of activities can be truly successful. Some of the problems, of course, are easier than others to solve. Some must be solved at the federal level, others at the local level, and still others through joint corrective action at the federal and local level.

Beginning at the federal level, there is a deep-seated problem in that insufficient coordination has existed between the Department of Health, Education, and Welfare (HEW) and the Department of Labor Attempts to resolve this problem are taking place, but the issue of turf protection is as real at the federal level as it is at the local level. A memorandum of understanding has been signed by the Secretaries of both agencies. HEW has established its own CETA office at the national level to look into the coordination issue. Still, the vocational education system throughout the country is planned and operated by a vast number of people who lack knowledge of the CETA law. State vocational education directors have learned what CETA is all about, but there are far too many at the local level who are still uneducated in the workings of CETA. It is the responsibility of HEW at the national and regional level to make sure that this education does not stop at the state director level, but filters down to those in the local education agencies so that the vocational education system can become more responsive to the needs of CETA clients.

Vocational education is a state program while CETA is a local program. They both operate on different planning cycles, have

different reporting requirements, and often use differing data sources. These problems also must be solved at the federal level.

Local elected officials are held politically accountable for the success of the CETA program in their own jurisdictions. That means that the unemployed must be provided with jobs and the unskilled unemployed must be provided with the necessary training to be placed in a job. When unemployment rates are high, the pressure to employ the unemployed is great and often more of a priority than skill training regardless of what the long-range implications are. That fact means that vocational education institutions must strive to attract more CETA clients and more CETA funding by making what they have to offer more relevant to CETA clients and to the labor market.

Another serious problem is that many vocational educators are having difficulty in "unlearning MDTA." Under the Manpower Development and Training Act, institutional skill training was a categorical program whereby money was channeled from the Department of Labor directly into the vocational education system to operate institutional skill training. With the advent of CETA, that categorical program ended, which led to many instances of resentment and turf protection. One prime sponsor indicated on its survey that it had "difficulty in convincing local education officials that it refused to use CETA funds to subsidize vocational education activities, but instead would use CETA to train the people most in need." That response points out another important issue. Both systems seek to train those in need, but they

both have differing philosophies. CETA clients are generally more economically disadvantaged than vocational education clients and, therefore, must be subsidized through stipends. Vocational education legislation defines disadvantaged to include educational and cultural deficiencies as well as economic and, therefore, its clients often do not need financial assistance. Vocational education takes place in an institutional setting and strives to train participants in a broad array of subjects over a much longer period of time than CETA training programs. Prime sponsors' emphasis is to provide job training to economically disadvantaged, unemployed, and underemployed. CETA training programs are more direct in terms of skill training as well as shorter in duration because it is the philosophy of CETA, both in intent and in spirit, that the unemployed are not interested in learning about citizenship, but are interested in getting a job as quickly as possible. Therefore, prime sponsors use a variety of instructors to meet the needs of their clients. The CETA philosophy calls for training programs to be flexible, and open entry/open exit in order to produce large numbers of job-ready clients. Instructors may be welders or mechanics and need not be certified teachers. This difference in philosophy is of major significance and must be reconciled before coordination can take place. Prime sponsors will not use large sums of Title I money to buy into institutional training programs if vocational education is not ready to meet labor market needs and the needs of CETA clients.

B. Program Administration

Under this section of the survey document, questions were structured to examine the amount of funds available for institutional skill training, numbers of slots and enrollees, and other administrative functions.

In order to ensure that the reader fully understands the terminology used in the following pages, a brief explanation of commonly used terms appears below:

MDTA and EOA - Manpower Development and Training Act of 1962 and the Economic Opportunity Act of 1964. These two pieces of legislation were the forerunners of CETA. Under MDTA and EOA, categorical grants were awarded to various local agencies for the provision of manpower services.

CETA - Comprehensive Employment and Training Act of 1973. The purpose of the Act is to "provide job training and employment opportunities for the economically disadvantaged, unemployed, and underemployed persons, and to assure that training and other services lead to maximum employment opportunities and enhance self sufficiency."

* Quoted definitions have been extracted from the CETA rules and regulations, U. S. Department of Labor, June 25, 1976.

Prime Sponsor- "A unit of government, combinations of units of government, or a rural Concentrated Employment Program grantee . . . which has entered into a grant with the Department of Labor to provide comprehensive manpower services under Title I of CETA."

Title I of CETA - "Establishes a program to provide comprehensive manpower services throughout the nation, including the development and creation of job opportunities, and the training, education, and other services needed to enable individuals to secure and retain employment at their maximum capacity."

Economically Disadvantaged - "A person who is a member of a family which: 1) receives cash welfare payments; or 2) has a total annual income for the 12 months prior to application, in relation to family size, that does not exceed the poverty level determined in accordance with criteria established by the Office of Management and Budget."

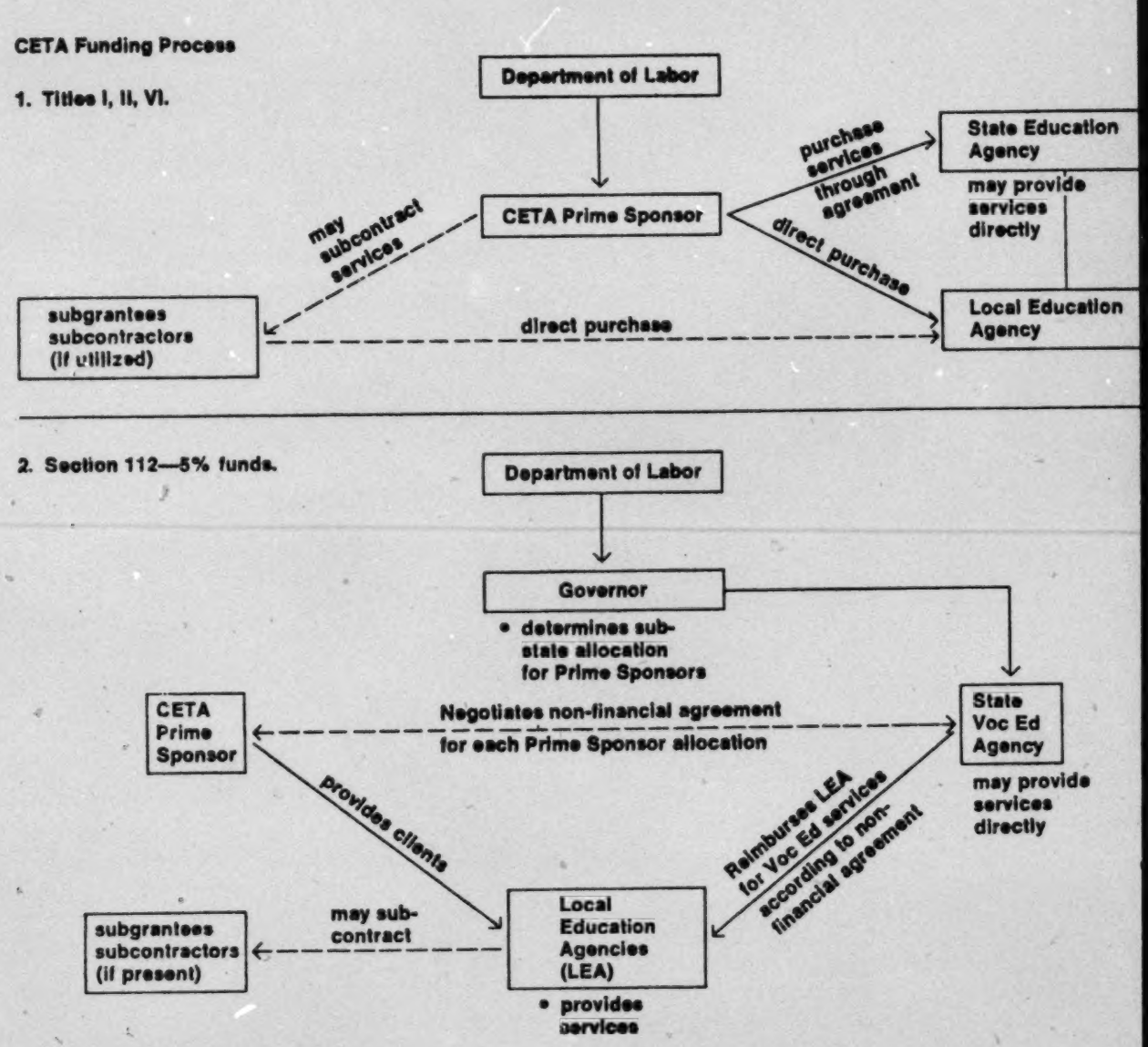
Five Percent Funds - "Five percent of the funds available under Title I of the Act (CETA) shall be allocated to the Governors of the states to provide needed vocational education and services for prime sponsors through State Vocational Education Boards."

Non-Financial-Agreements — A financial, statistical, and narrative plan developed by the prime sponsor in conjunction with the State Vocational Education Board for the expenditure of the five percent funds by the Vocational Education Board in the prime sponsor's area. The plan must be signed by both the prime sponsor and the State Vocational Education Board. It is called non-financial because none of the five percent funds are actually passed through to prime sponsors.

1. State Administration of the Five Percent Vocational Education Funds

Funds under Section 112 of Title I in the CETA law are designated to be used "for providing vocational education services to participants in programs under this title in accordance with an agreement between the state vocational education board and the prime sponsor." In addition, the prime sponsors can obligate as much of their Title I grants to vocational education as is their desire. Basic Title I grant funds flow directly from the Department of Labor to the prime sponsor. The following chart represents the CETA funding process for Titles I, II, and VI (Title II is the Public Employment Program element of CETA and Title VI creates the Emergency Jobs Program). In addition, the funding process for Section 112 (five percent vocational education funds) of CETA is diagramed on the next page.

CETA FUNDING PROCESS*



*U. S. Department of Health, Education, and Welfare, Office of Manpower, Education and CETA (Washington, D. C.: Government Printing Office, 1976, p. 15.)

The definition of the purpose of Section 112 monies has been the cause of problems in some jurisdictions because some vocational educators and prime sponsors have had difficulty in coming to an agreement on how these funds should be spent. The FY 1977 rules and regulations (Section 95.56(2)(i)) specify allowable vocational education services which may be provided by state vocational education boards (as agreed upon with the prime sponsor) with the five percent funds as including, but not limited to, basic or general education, educational programs conducted for offenders, institutional training, and supportive services . . . In addition, Section 95.34(c) specifies that "allowances shall be paid to participants for time spent in classroom training." Many vocational educators object to the payment of allowances to participants out of the five percent funds even though they are clearly allowable under the rules and regulations. This has been the source of one problem in negotiating non-financial agreements. Another potential trouble spot was created in the following excerpt from the FY 1977 rules and regulations.

> Section 95.58(2)(i)
>
> If, within 90 days after notification of available funds for the area has been provided, the prime sponsor and the Board are unable to reach an agreement, the Governor shall mediate the dispute, with the intent of insuring that the local vocational education needs of the prime sponsor's area are met. The Governor retains the authority to determine, in consultation with the prime sponsor, the purposes for which the funds should be used. If mediation by the Governor

> does not result in a solution acceptable to both parties . . . the Governor may then redistribute the funds to another prime sponsor area.

The National League of Cities and the U. S. Conference of Mayors protested the above paragraph when similar language appeared in the draft regulations. There is concern over this provision because it allows the Governor to mediate disputes even though the Governor is an interested party in the negotiations. Also, it has the effect of penalizing local citizens by denying services as intended by the five percent vocational education funds. It also diminishes prime sponsor flexibility. A basic premise of CETA is that local needs can be determined best at the local level. The above paragraph is in direct opposition to that concept.

The following is a brief description of Savannah, Georgia's experiences in negotiating for vocational education activities for the use of the five percent funds. Surface problems were solved, but Savannah noted that there are long standing philosophical differences that make a truly coordinated system of providing vocational education and CETA services a difficult task.

SAVANNAH, GEORGIA

Through the use of five percent vocational education funds, 270 CETA clients are being placed as individual referrals into classroom training at the Savannah Vocational Technical School (there is no skill center in Savannah). The prime sponsor is not using any Title I dollars for additional classroom training at the vocational technical school (the local Opportunities Industrialization Center is receiving some Title I funding for attitudinal and motivational training.). Title I funds are being used for allowances and child care services for enrollees in the vocational technical institute. During the process of negotiating its local non-financial agreement, the State informed Savannah that no five percent funds could be used for allowances or any other supportive services even though the Department of Labor has indicated that it is acceptable to pay allowances out of five percent funds.

The state restricted the use of five percent funds to tuition, supplies, and administration (funds also were used to hire a CETA coordinator within the vocational education system). All five percent funds had to remain within the State Department of Vocational Education for use within its own system.

A dispute arose between the vocational technical school and the prime sponsor shortly after CETA's implementation. Under MDTA, four cooking classes per year were funded at the school. Seventy-five percent of the cooking class graduates were put to work intermittently at school

cafeterias, but only as labor shortages arose. In addition, they were being paid only the minimum wage which was $2.00 an hour at that time. The prime sponsor resented this treatment of enrollees, particularly since they were paying $2.10 an hour to clients simply during the training process. Relations sunk to a low point when the prime sponsor insisted in cutting out the cooking courses. However, with the additional five percent funds resulting from the alleviation of the cooking courses, more enrollees were served in FY 1976 than in FY 1975.

Savannah's problems were mainly with the vocational education system at the local, rather than state level (the main problem with the state was the restriction on using five percent funds for supportive services). Relations are now more harmonius, but a completely coordinated system will be difficult to achieve because of philosophical differences as well as deep-seated turf protection. The prime sponsor indicated that the largest philosophical difference is that vocational educators consider their responsibilities to clients ended upon completion of training while the prime sponsor maintains that job placement at the end of training is crucial to meeting the needs of enrollees. In addition, the prime sponsor indicated that vocational educators are still suspicious of prime sponsors and the whole CETA system.

Distribution of the five percent funds among the prime sponsors in each state is purely a state function with no particular formula in the CETA rules and regulations to assure equity. Despite the problems indicated by prime sponsors with the state handling of the five percent funds, response to the question asking prime sponsors whether or not they were satisfied with the non-financial agreements negotiated with their state was favorable. Sixty-four prime sponsors indicated that they were satisfied with their non-financial agreements, while only eight responded that they were not satisfied. Reasons for dissatisfaction were: high administrative costs; difficulty in monitoring negotiated activities; attitudes of vocational education institutions, which feel that five percent funds belong to them; and general bad faith bargaining. In our study of the FY 1975 situation, 44 prime sponsors were satisfied, seven were not, and eight did not respond. This would indicate a somewhat improved level of satisfaction in FY 1976.

In another question, prime sponsors were asked for the amount of their Title I allocation as well as their state's share and what percentage of their state's total share was allocated for use in their jurisdictions. In response to that question, several prime sponsors indicated that they were unhappy with the state's distribution of the five percent funds. For example, Philadelphia indicated that the state of Pennsylvania changed the distribution formula from last year, which resulted in decreasing the share of five percent funds going to the two major cities (Philadelphia and Pittsburgh).

As in FY 1975, New York City received the largest amount of both Title I and five percent funds in FY 1976. However, the Baltimore, Maryland, consortium (consisting of the city of Baltimore and five surrounding counties) received the largest percentage share of the five percent CETA vocational education funds available in each state. In contrast, Fort Wayne, Indiana, received the smallest share of Title I funds, while the smallest amount of five percent funds was received by Duluth, Minnesota. Erie, Pennsylvania got the smallest percentages, receiving only one percent of Pennsylvania's share of five percent funds. The variance is great in each state because each state determines its own formula. Language, however, has been added to the FY 1977 CETA rules and regulations requiring states to notify prime sponsors of the methodology used in distributing the five percent funds. The most common distribution formulas are as follows:

1) based on unemployment and census data;
2) based on the proportion of Title I funds each prime sponsor had within the state;
3) a straight five percent of each prime sponsor's share of Title I money; and
4) combination of methodologies.

The complaint is still voiced among prime sponsors that by giving states control over the distribution of those funds, the five percent funds go against the intent of CETA which is local flexibility. Prime sponsors often indicate that if that system must be maintained, a fair and equitable distribution formula should become part of the CETA rules and regulations.

An issue of major significance when discussing the state's role is the issue of administrative costs. When the administrative costs issue was examined in the FY 1976 study, it was discovered to be one of the most explosive and confusing of problems to prime sponsors. The regulations are little changed in FY 1977 on the subject of administrative costs. The confusing aspects have not been clarified. One new dimension, however, is that in Section 95.52(A)(4) states now are required to provide an explanation in their vocational education services program narrative of administrative costs which exceed 20 percent.

Pertaining to the five percent vocational education funds, the FY 1977 CETA rules and regulations address the administrative costs issue as follows:

> Section 98:12 (f)(6)
>
> > Administrative costs shall be limited to those necessary to effectively operate the program. They shall not exceed 20 percent of the total planned costs for all program activities other than public service employment unless the Program Narrative Description under Section 95.14(b)(2)(i) sets forth an explanation of how all Administration costs have been determined and a detailed documentation to support that amount. The restriction on the use of funds for administration in public service employment programs is set forth in Section 96.36 (Sec. 108(d)(2).

It was unclear at the time of the initial study whether or not the 20 percent ceiling meant that a state could take 20 percent of each prime sponsor's share or whether it applied to the overall state allocation. It also was discovered that many prime sponsors had no idea of what percentage their respective states used for administration. The FY 1977 rules and regulations do not specifi-

cally resolve the above issues. However, the interpretation of Department of Labor officials is that the 20 percent limitation is an overall state limitation.

There also has been a problem in defining what is allowable under administrative costs. Some want strict definitions, others want definitions to be liberalized. The FY 1977 rules and regulations maintain that administrative costs are as follows:

Sec. 98.12(e)(6)

> Administration costs shall consist of all indirect and direct costs associated with the management of the grant. Such costs are those which do not directly and immediately benefit participants but are necessary for effective delivery of direct participant benefits. These costs are generally identified with supervision, and management, fiscal and record keeping systems...

Examples of administrative costs are cited in Section 98.12(f)(6)(iii). As such administration costs may include:

> ...all costs of clerical personnel, materials, supplies, equipment, space, utilities, and travel which are identifiable with these direct program administration positions shall be charged to administration. Some examples of administrative costs are the salary of a clerical assistant to a supervisor, that part of an instructor's salary representing time spent supervising other instructors, desk top supplies used by supervisors and in general office administration, rent, depreciation or maintenance of non-classroom space, staff training, consultants services under contract not involving direct training or services to participants, ...

Many vocational educators at the local institution level have taken issue with what is allowable under the category of administrative costs. They argue that many costs charged to administration are in fact training costs because they are necessary for the training of

clients. If the definition were changed, the 20 percent limitation would not be as difficult to cope with. Many prime sponsors feel, however, that if it were liberalized, the entire five percent grant, would in effect, would be spent on administration rather than on client training. The result of this disagreement at times has been the cause of negotiation difficulties and bad faith bargaining.

In the survey document, prime sponsors were asked for the percentage of five percent funds that their respective states used for state administration. Twenty prime sponsors either did not know or did not respond to the question. In comparison, 25 prime sponsors did not know how much of the five percent funds went to state administration in the FY 1975 study. All prime sponsors should know the answer to that question because it has some bearing on how much of the total state allotment remains to be used for local administration. An average of 11.42 percent of the five percent funds were spent by the states of the 54 responding prime sponsors on administration. Because of the overall 20 percent limitation on administrative costs for the entire state allotment, an average of only 8.58 percent remained to be spent for local administration in the respondents' states.

2. Prime Sponsor Administration

In question number 16 of the survey, prime sponsors were asked if they were using Title I funds in addition to five percent funds for vocational education training or for supportive services to vocational education enrollees. Once again the response to this question shows no real change from the original study which also asked that question of prime sponsors. In FY 1975, 58 out of 59 prime sponsors were committing Title I funds to the support of a vocational education effort. In FY 1976, 71 prime sponsors out of the 74 who responded were using Title I funds. Prime sponsors were not asked for the dollar amount of Title I funds committed in FY 1976 as they were in FY 1975. The reason for this deletion is that inflation in most cases was the cause for any increases in Title I funding and usually not greater commitment. Instead, prime sponsors were asked for a comparison in the number of slots created and enrollees served in both years. By doing so, it was substantiated that relatively small changes had occurred (see page 25). At this time, however, it must be stated that however small the increase in slots and enrollees from FY 1975 to FY 1976, the increase occurred in a recessionary period of time when large numbers in the labor force were unemployed and the emphasis was on providing public service employment rather than classroom training. That fact speaks for itself and is of great importance.

In order to measure any significant numerical changes in prime sponsor's commitment to vocational education, questions were asked

concerning the numbers of slots and enrollees participating in FY 1975 and FY 1976. The first question asked for the number of enrollees who were served and the number of slots created both in FY 1975 and in FY 1976 through the use of the five percent funds only. A slight increase in both the number of slots and enrollees occurred from FY 1975 to FY 1976. To be exact, 68 prime sponsors served a total of 20,583 enrollees in FY 1975, averaging 302 enrollees per prime sponsor. In FY 1976, 66 prime sponsors served a total of 21,054 enrollees, averaging 319 enrollees per prime sponsor. In terms of slots in FY 1975, 64 prime sponsors created a total of 15,852 slots with the five percent funds, averaging 247.68 slots per prime sponsor. Sixty-five prime sponsors created 17,683 slots, averaging 272 per prime sponsors in FY 1976. It can be said from the above data that the five percent funds earmarked for vocational education stretched a bit further from FY 1975 to FY 1976, but increases were not dramatic. Five percent funds are, of course, limited. Because funds are limited and because inflation has taken its toll, one could not expect the five percent funds to bring about any substantial increases in slots and enrollees, as would be possible with Title I dollars. The following chart represents the slot/enrollee breakdown in FY 1975 and FY 1976 through the use of five percent funds.

TOTAL NUMBER OF ENROLLEES SERVED IN FY 1975 AND FY 1976 THROUGH THE USE OF THE FIVE PERCENT FUNDS

	FY 1975 (N = 68)	AVERAGE NO. OF ENROLLEES PER PRIME SPONSOR	FY 1976 (N = 66)	AVERAGE NO. OF ENROLLEES PER PRIME SPONSOR
Enrollees:	20,583	302	21,054	319

TOTAL NUMBER OF SLOTS CREATED IN FY 1975 AND FY 1976 THROUGH THE USE OF THE FIVE PERCENT FUNDS

	FY 1975 (N = 68)	AVERAGE NO. OF SLOTS PER PRIME SPONSOR	FY 1976 (N = 65)	AVERAGE NO. OF SLOTS PER PRIME SPONSOR
Slots:	15,852	248	17,683	272

Although the above data are important in knowing how much is being done with the earmarked money, it is not particularly significant in comparing the commitment of prime sponsors to vocational education in FY 1975 with their FY 1976 commitment. What is significant are data concerning the use of Title I dollars. Title I dollars are strictly prime sponsor dollars. No collaboration with the state or any outside party is required. It is with Title I dollars that prime sponsors, if they so choose, can increase the funding of vocational education institutions. From the responses to the survey, the data show that in FY 1975, 64 prime sponsors placed a total of 79,833 enrollees in institutional classroom training. That amounts to an average of 1,247 enrollees per prime sponsor. In FY 1976, 63 prime sponsors placed 94,376 enrollees into an institutional setting, averaging

1,498 enrollees per prime sponsor. In terms of slots, 61 prime sponsors used Title I funds in FY 1975 to create a total of 39,858, or an average of 653 slots per prime sponsor. FY 1976 showed a small increase with 62 prime sponsors indicating that they created 49,733 slots with their Title I funds, which comes to an average of 802 slots per prime sponsor.

TOTAL NUMBER OF ENROLLEES SERVED
IN FY 1975 AND FY 1976 THROUGH
THE USE OF TITLE I FUNDS

	FY 1975 (N = 64)	AVERAGE NO. OF ENROLLEES PER PRIME SPONSOR	FY 1976 (N = 63)	AVERAGE NO. OF ENROLLEES PER PRIME SPONSOR
Enrollees:	79,833	1,247	94,376	1,498

TOTAL NUMBER OF SLOTS CREATED
IN FY 1975 AND FY 1976 THROUGH
THE USE OF TITLE I FUNDS

	FY 1975 (N = 61)	AVERAGE NO. OF SLOTS CREATED PER PRIME SPONSOR	FY 1976 (N = 62)	AVERAGE NO. OF SLOTS CREATED PER PRIME SPONSOR
Slots:	39,858	653	49,733	802

The overall increases in enrollees and slots from FY 1975 to FY 1976 are not very large, but they are significant in that they indicate that relationships are somewhat improved simply because there was an increase rather than a decrease.

In a later question, prime sponsors were asked to identify where CETA-funded vocational education takes place. A

comparison was made between the number of slots and enrollees in pre-CETA days (under MDTA and EOA) by various institutions and FY 1976 figures. This question referred to a combination of five percent and Title I dollars. It is interesting to note that, in general, the percentages in terms of slots and enrollees in each of the institutions, have shown a great increase since vocational education has come into the CETA realm. These increases are somewhat confusing. Prime sponsors seem to have substantially increased vocational education funding since the days of MDTA, while only slightly increasing the funding from FY 1975 to FY 1976. In our FY 1975 study, we indicated that little had changed during the transition from MDTA to CETA, and now we are saying that in fact large increases have taken place between the days of MDTA and FY 1976 (the second year of CETA implementation). The question, therefore, is when did increases occur. Perhaps our FY 1975 study did not reflect large growth because the survey in FY 1975 was completed by prime sponsors early in CETA's implementation when many prime sponsors had not locked in all of their Title I dollars and were not yet familiar with the vocational education system. Also, the increases seem to be reflected over a wider range of institutions than just the local skill centers which were the major funding recipients under MDTA. In fact, data indicate that skill centers did not experience growth in the number of slots in FY 1976 as compared with FY 1974.

C. Program Operations

In this section of the survey, prime sponsors were questioned about the substance of their CETA-funded vocational education programs. In order for the data in this section to be presented as clearly as possible, charts have been used in many instances to allow the reader to actually visualize the data.

1. Recruitment and Placement, and Determination of Occupational Needs

It was important in this study, as in the FY 1975 study, to determine which offices or agencies assess occupational needs, provide recruitment and placement services, and carry out the actual contracting for training and services for CETA-funded vocational education enrollees. The numbers in this section will appear to be swollen because the nature of these questions (multiple choice) allowed a prime sponsor to indicate more than one agency.

It was learned that in FY 1976, as in FY 1975, most prime sponsors relied on their respective state employment service, in total or in part, to provide labor market projections for use in planning vocational education training. Specifically, in FY 1976, 68 prime sponsors, out of the 74 responding, used their employment service. In FY 1975, the ratio was less (25 prime sponsors out of 59 included in the study); however, almost half of the respondents used the employment service to determine occupational needs. The importance of an effective employment service, therefore, is evident. If the training provided by institutional vocational education is to be

relevant in terms of labor market needs, then the agency providing that data must provide up-to-date data to those who function in a planning capacity. The Employment Service, as a matter of fact, currently is being scrutinized by the Congress for its effectiveness.

The second most often used data source for planning of vocational education activities is the prime sponsor itself. Responses indicate that they do some or all of their own labor market projections. The remainder of respondents indicated that a local education agency or another institution, such as a college or university, provides necessary data.

Recruitment and placement of enrollees in classroom training in FY 1976 is an equal function of both the prime sponsor's office and the local employment service. Thirty-one prime sponsors do their own recruitment and placement, and 31 prime sponsors use the employment service. Twenty-three prime sponsors responded that they rely on a community-based organization, the skill center, or another subcontractor for classroom recruitment and placement. In terms of recruitment, in FY 1975 the major responsibility rested with the employment service. FY 1976 shows the prime sponsor taking equal responsibility for that function.

In terms of job placement, 40 prime sponsors indicated that the employment service had that responsibility. Twenty-six prime sponsors indicated that they did their own job placement; 13 prime sponsors used a local education agency to do job placement, and 24 used another organization such as a community-based organization or a subcontractor.

2. Where CETA-Funded Vocational Education Takes Place

On the survey document, prime sponsors were asked in two separate questions for the number of slots and enrollees both prior to CETA (under MDTA and EOA) and currently in FY 1976 at the various institutions. The chart on the next page represents data collected from those questions. Forty-eight prime sponsors responded with information on the number of slots funded at various institutions in FY 1974, while 52 prime sponsors were able to provide information on the number of enrollees in FY 1974. The responses of the same prime sponsors were used to measure changes that occurred from FY 1974 to FY 1976.

WHERE CETA-FUNDED VOCATIONAL EDUCATION TAKES PLACE

	SLOTS			ENROLLEES		
	FY74(MDTA and EOA) N = 48	FY 1976 N = 48	PERCENTAGE INCREASE OR DECREASE	FY74(MDTA and EOA) N = 52	FY 1976 N = 52	PERCENTAGE INCREASE OR DECREASE
Community Colleges/ Public Technical Institutes	1,057	2,610	+147%	4,063	4,601	+ 13%
Opportunities Industrialization Centers (OIC's)	3,663	4,850	+ 32%	10,808	7,856	- 27%
Proprietary Schools	464	1,023	+120%	1,104	1,820	+ 65%
Public Secondary Schools	1,450	731	- 50%	1,354	982	- 27%
Skill Centers	6,964	5,558	- 20%	17,498	12,737	- 27%
*Other	1,764	2,954	+ 67%	3,235	4,240	+ 31%
TOTALS	15,362	17,726		38,062	32,236	

*Generally community-based organizations or other local subcontractors.

**For the purpose of a meaningful comparison, the responses of the same prime sponsors used in the FY 1974 columns in the above chart are also used in the FY 1976 columns.

PITTSBURGH, PENNSYLVANIA

In The Impact of CETA on Institutional Vocational Education, Pittsburgh was cited as a prime sponsor having difficulty in negotiating vocational education activities with its local skill center (the postsecondary institution which was formerly the recipient of MDTA and EOA funds).

Pittsburgh's FY 1975 share of the five percent vocational education funds was not large enough to maintain the skill center at the MDTA level. Through Title I funds, Pittsburgh could have maintained the skill center's pre-CETA funding level, but chose not to do so because a review, conducted by the Mayor's office, revealed some major problems with the courses offered and the administration of the skill center. Some of those problems were: poor performance in relation to cost; excessive administrative costs; and training equipment that was ordered too late to arrive on time for a particular course. Pittsburgh finally signed a non-financial agreement to fund 185 slots in FY 1975 at the skill center (this was a reduction from FY 1974 when 250 slots were funded under MDTA). The city then funded 100 individual referral slots at proprietary schools out of Title I funds.

Pittsburgh's share of five percent funds is less in FY 1976 than it was in FY 1975 because of a new state distribution formula which resulted in a reduction of funding for Pennsylvania's two major cities. The new formula is based on total population, income level, number of

unemployed, and educational level. Data used have been extracted from the 1970 census and from projections.

Negotiating with the local skill center for FY 1976 activities was difficult. Because its funding source was the state, the skill center refused to accept prime sponsor policy decisions for what was to be done with CETA funds in providing classroom training to CETA clients. The city, as prime sponsor, wanted to determine what staff was needed, what forms were to be used, and what budgeting procedures were to be used. The skill center also looked with disfavor upon the city's intention to monitor and evaluate the progress of CETA-funded enrollees.

Pittsburgh solved its problems with the skill center by using its FY 1976 five percent funds for class size skill training at sites other than the skill center. Other training sites include proprietary schools, OIC's, and various non-profit agencies. They then decided to use Title I dollars to bypass the state and contract directly with the skill center for less than class size or individual referral slots. The less than class size training is less expensive and also allows the prime sponsor more flexibility in placing enrollees into ongoing classes which meet the needs of each particular enrollee. Also, because funding is now coming from prime sponsor Title I funds, working relationships between the city and the local skill center have become much more cooperative.

3. Types of CETA Training

As an informational question, prime sponsors were asked to identify the programmatic types of classroom training funded by CETA in their jurisdictions. It was not surprising to find that the overwhelming majority of prime sponsors (69) offered training in the office occupations cluster. Almost as many prime sponsors (67) provided funds for training in industry and the trades, a broad area which traditionally has offered good employment opportunities. Sixty prime sponsors are funding training in the health occupations cluster, and 52 prime sponsors have classroom training programs in the technical occupations. The above are the predominant occupational training clusters as indicated by the 74 respondents to the survey. The following chart represents the total response, so that the reader may have a clear picture of the types of training being offered locally by the responding prime sponsors.

TYPES OF CETA TRAINING

(N = 74 Prime Sponsors)

	No. of Prime Sponsors
AGRICULTURE	4
CONSUMER AND HOMEMAKING	10
DISTRIBUTIVE EDUCATION	13
HEALTH OCCUPATIONS	60
OCCUPATIONAL HOME ECONOMICS	7
OFFICE OCCUPATIONS	69

	No. of Prime Sponsors
TECHNICAL OCCUPATIONS	52
TRADE AND INDUSTRIES	67

4. Supportive Services

It is important for the purposes of this study to discuss the issue of supportive services. CETA clients are generally economically disadvantaged, which means that their universe of need is greater than just classroom skill training. A prime sponsor must be prepared to provide the supportive services needed to prepare CETA clients for the training that leads to job readiness and finally to placement in a job. The supportive service most often supplied to CETA clients is the payment of allowances. A controversial issue to date has been whether or not prime sponsors could use all or part of the five percent vocational education funds for the payment of allowances. Vocational educators have objected to prime sponsors doing so, because they argue that those funds should be used strictly for training. Prime sponsors, on the other hand, argue that the funds still are being used for vocational education because CETA clients could not participate in training without being supported by allowances. Also, many prime sponsors find that in terms of fiscal management, it is easier to pay allowances to vocational education enrollees out of the five percent funds and then to use Title I funds for training. This system also gives prime sponsors more flexibility in determining how CETA funds will be spent in providing classroom

training because only prime sponsors determine what is to be done with Title I funds. Prime sponsor flexibility is in keeping with the intent of the CETA legislation. The Department of Labor has ruled with prime sponsors in allowing the five percent funds to be spent on allowances.

Responses to our survey show that 65 out of the 74 respondents use CETA funds (either five percent or Title I) to provide allowances as a supportive service to vocational education enrollees. Other supportive services include child care, transportation, GED, English as a second language, and medical and legal assistance. The following chart represents the number of prime sponsors that provide each of the supportive services to CETA-funded vocational education enrollees.

SUPPORTIVE SERVICES

(N = 74 Prime Sponsors)

Services Provided	No. of Prime Sponsors
Allowances	65
Child Care	45
English as a Second Language	30
GED	49
Other (Medical, Legal, Housing Assistance)	32

As is evident from the above chart, the cost to prime sponsors for providing vocational education to CETA clients includes much more than paying teachers.

D. Program Coordination

This section of the report deals with how CETA prime sponsors and members of the vocational education community relate to each other in terms of cooperative interaction.

An often-voiced suggestion for increased coordination between prime sponsors and vocational educators has been greater access and participation on each other's planning and advisory councils. In line with that recommendation, prime sponsors were asked if the representation of the vocational education community on their respective manpower advisory councils had increased, decreased, or remained the same in FY 1976. Once again,the overwhelming response was that little had changed from FY 1975 to FY 1976. Specifically, no prime sponsors reported decreases, eight prime sponsors indicated increases, and 66 prime sponsors responded that vocational education representation on their respective manpower advisory councils has remained the same. In the FY 1975 study, an average of two representatives from the vocational education community served on each manpower advisory council. Because the majority of prime sponsors responded that no change had occurred, it can be said that the potential influence, in terms of numbers, of vocational educators on manpower advisory councils has not increased.

The data accumulated from the 74 prime sponsors included in this study repeatedly have indicated lack of substantial change and growth in prime sponsor funding of vocational education. That conclusion does not indicate necessarily that prime sponsors and

vocational educators have not improved their relationships with each other. In fact, it is interesting to note that when prime sponsors were asked if their working relationships with those institutions that provide vocational education in their respective communities had become more effective, less effective, or remained the same during FY 1976, the majority of respondents (39) reported that their working relationships had become more effective. Thirty-two prime sponsors responded that there was no change in working relationships, and only three reported deteriorating relationships. The response to that question is very significant--it implies that cooperation and coordination are not necessarily tied to funding. In conversations with prime sponsors, many indicated that their understanding of one another as well as their working relationships had become significantly better, even if funding had not been increased.

The problems are, however, large and difficult to resolve. Turf protection and differing philosophies rank as the most serious and often mentioned problems when prime sponsors are queried. Also, varying roadblocks exist at the state level. For example, because of the lack of a reciprocal agreement on an inter-state basis between Iowa and Nebraska, the city of Omaha cannot use an excellent vocational education institution across the river from Omaha.

In addition, a bad economy has added to the problem of coordinating the two systems because it has tended to strengthen already existing philosophical differences as well as priorities. High unemployment has brought about two separate reactions. Prime sponsors

have reacted by putting more emphasis on quick job placement, while vocational educators argue that high unemployment strengthens the need for employability training as well as skill training so that an individual is better able to cope with changing labor market needs.

Perhaps as the economy recovers and unemployment rates drop, prime sponsors will increase funding of institutional skill training. There still, however, will be a question of which institutions predominate. Those institutions which best can meet the needs of CETA clients and those of the labor market will be selected.

Time also will diminish some of the problems brought about by turf protection. Hopefully, vocational educators in time will come to realize that MDTA is truly gone and that CETA and local elected officials are taking its place. At the same time, prime sponsors must strive genuinely for improved coordination by recognizing the vocational education system as a potential resource for meeting local needs.

The survey asked prime sponsors for incentives used locally for improving CETA and vocational education coordination. In terms of numbers, very few prime sponsors responded to that question at all. It is very interesting to note, however, that of those who did respond, the most commonly quoted incentive was "money." Prime sponsors have control of the Title I purse strings. Vocational educators could respond that this is not cooperation, but instead coercion. The fact of the matter remains that many prime sponsors see CETA dollars as an enticement and an incentive for better coordination. Another common

response to the incentive question is a much less flammable response--communication and participation in planning councils and in the writing of program plans. These suggestions have been discussed earlier in the report and are taking place to some extent.

Duluth, Minnesota is an example of how a prime sponsor and a state vocational education system could combine forces to solve a problem that left unsolved would have resulted in the closing of a vocational education institution. The following is a brief description of how Duluth has managed its CETA-funded vocational education activities.

DULUTH, MINNESOTA

In FY 1976, Duluth contributed 77 percent of the total cost of operating its local skill center. It did so despite 10 percent funding reduction in its Title I grant and a cut in the amount of its five percent vocational education allocation. The balance of the skill center funding came from the Northeast Correctional Center, the WIN program, and the seven county manpower consortium surrounding the city of Duluth.

Duluth has been pleased with the performance of the skill center. Needs of CETA clients have been met through individual attention and an open entry/open exit system. The city attributes this good relationship to the fact that it provides the majority of the funds necessary for the skill center to exist. Despite the good performance of the skill center, the number of slots created in FY 1976 did not increase. This is due to inflated operating costs and also the reduction in CETA funding to the city of Duluth. The skill center, however, did service many more enrollees because training slots were split into shorter periods of time so that more than one enrollee filled each slot. The City has not been as pleased with other public vocational institutes as it has been with the skill center because they have not been as responsive to the needs of CETA clients in terms of training courses available.

Duluth again is facing a reduction in CETA funding in FY 1977, and because of the constantly increasing operating costs, the skill center was in real danger of being phased out in FY 1977. The City, however,

was successful in convincing the State Department of Vocational Education to contribute to the maintenance of the skill center. The state is going to pick up the training costs for all enrollees under the age of 21. The joining of forces between the state vocational education system and the CETA prime sponsor to continue the existence of the skill center is a real example of a cooperative working relationship.

CONCLUSIONS

The purpose of this report is to update the findings of The Impact of CETA on Institutional Vocational Education in order to measure any changes that occurred since CETA's implementation. We had hoped that in the process of surveying prime sponsors some good examples of CETA/vocational education cooperation would emerge. The responses, however, did not point to specific mechanisms used to improved coordination at the local level.

The results of this study indicate that no major increases in the funding of vocational education slots and enrollees occurred in FY 1976. High unemployment rates and the generally bad state of the economy are responsible partially for the lack of increased prime sponsor funding of vocational education activities. In addition, philosophical differences still need to be rectified before large increases in funding take place.

Prime sponsors must provide skill training and job placement to the hard core unemployed. These individuals are economically disadvantaged and usually require assistance with social problems ranging from medical to legal assistance. The prime sponsor, therefore, must meet the needs of its local clientele and, in addition, must respond to the needs of its local labor market. Prime sponsors must be able to place enrollees into an open entry/open exit system. The emphasis is strictly on direct skill training and ultimately on job placement. The certification of teachers is not a requirement. Prime

sponsor philosophy is that it is more important for an instructor to be able to relate to the economically disadvantaged than to be certified. Therefore, instructors often come directly from the professions being taught. The vocational education system traditionally has supported long-range skill training programs which function on a closed school year system and are taught by certified teachers. Enrollees are taught how to function in the world of work in addition to being given direct skill training.

CETA allows prime sponsors to choose which local service delivery agencies can provide the best and most efficient services in meeting local goals. The vocational education system is a function of the state and is only one of a variety of service deliverers available to prime sponsors. Others include proprietary institutions, community based organizations, private industry, etc. Increased funding of the institutions within the vocational education system will become a reality only through prime sponsors' positive evaluation of performance.

Turf protection still remains a coordination problem. This problem is difficult in that it exists at the federal as well as the local level. The Department of Health, Education and Welfare and the Department of Labor must work together to coordinate the activities funded by their respective agencies. In particular, communication between agency officials should be routine practice. Rules and regulations for related program activities should be coordinated. Program data should be drawn from the same sources. Planning cycles

for related activities should be coordinated or at least be responsive to program activities of each other.

At the state and local level, MDTA must be forgotten. The vocational education system must accept CETA as the replacement for MDTA and work to satisfy the goals of CETA. The prime sponsor, in turn, should recognize the vocational education system's long history in skill training, a history that can be a valuable local resource in meeting optimum goals.

States have control over the allocation of the five percent funds. There is no provision in the CETA rules and regulations for ensuring equity in a state's distribution formula. Once the funds are allocated, the state then negotiates a non-financial agreement with the prime sponsor, a cumbersome and complicated procedure. In the new FY 1977 rules and regulations, the Governor has been given even more control over the five percent funds because he or she can award the funds to an institution of his or her choice if a prime sponsor and the state cannot come to agreement on a non-financial agreement. This is significant in that the Governor is not an uninterested party in the negotiating process, and because it takes away from the prime sponsor flexibility intended by CETA.

The five percent vocational education funds should be used for meeting local goals through cooperative planning. All too often they have become a source of divisiveness, with interested parties arguing over whose money it is and the allowable uses for the funds. Perhaps time will solve the turf protection problem. Already, in FY 1976, prime sponsors indicated improved working relationships with those

institutions that provide vocational education in their respective communities. To further that cause, increased dialogue and the willingness to be flexible are essential elements. Participation in each other's planning and advisory councils is one important forum for interchange. The needs of the local target groups always should remain the prime consideration for planning activities rather than political turf protection.

APPENDIX I

LEGISLATIVE UPDATE

Vocational education programs traditionally are administered by the U.S. Office of Education of the Department of Health, Education and Welfare through matching grants to states in accordance with a formula based on the number of persons in each state of various age groups needing vocational education and the states per capita income. The state board of education then provides funds to a city or county board of education to develop and conduct a vocational education program. Programs are primarily for students from 15 to 20 years of age, either in high schools or having graduated from high schools lacking employable skills.

Enabling legislation for providing federal dollars to the states stems from the Vocational Education Act of 1963 and subsequent education amendments in 1968 and 1972.

One item on the agenda of the 94th Congress when it opened was the consideration of legislation for the purpose of extending and amending the Vocational Education Act of 1963, which was due to expire in June, 1976. (Vocational education funding currently is coming from a three-month transitional appropriation covering July-September, 1976.) Numerous bills were sponsored by interested parties, such as the American Vocational Association (AVA), the American Association of Community and Junior Colleges (AACJC), the National Assotion of State Universities and Land Grant Colleges (NASULGC), and the Administration. The major issues in the various bills were:

a) increasing the set-asides for postsecondary institutions and for the disadvantages;

b) whether or not to continue state matching requirements and if so, at what level; and

c) the consolidation of categorical programs.

The bill that finally emerged from the House and was passed by the House after a floor debate (390-3) on May 12, 1976, is H.R. 12835. Specifically, H.R. 12835 increases the set-aside for disadvantaged to 25 percent from the 15 percent contained in the 1963 law. The definition of disadvantaged, however, differs from that used in the CETA law. H.R. 12835 defines disadvantaged to include educationally as well as economically disadvantaged, while CETA uses an economic measure only.

The State Vocational Education Board would remain the planning and administrative agency in each state, but H.R. 12835 has included language that requires the boards to "actively involve" the participation of higher education agencies and manpower agencies in the preparation of the state plan. Three-year vocational education plans would be required rather than the current system of preparing annual plans. Under the three-year planning cycle, coordination with manpower programs might be accomplished more readily in that a frequently voiced problem in the coordination issue is the fact that both manpower and vocational education programs currently operate on differing annual cycles.

The Senate bill under consideration is Senator Claiborne Pell's (D -R.I.) omnibus education bill (S. 2657), which addresses elementary,

secondary, and vocational education in one bill rather than just vocational education. Action by the full Senate is expected at the end of July.

The 15 percent set-aside for disadvantaged remains unchanged in S. 2657. A new dimension in this bill is the creation of state planning commissions to plan vocational education programs. State agencies, however, would continue to administer programs and could even continue planning them if they can assure that all interested groups are represented.

APPENDIX II

The following is a list of the 74 prime sponsors who responded to the survey and whose responses are analyzed in this report:

ALABAMA

Birmingham
Huntsville

ARIZONA

Phoenix
Tucson

CALIFORNIA

Los Angeles
Oakland
San Diego
San Francisco
San Jose

COLORADO

Denver

CONNECTICUT

Hartford
New Haven
Waterbury

FLORIDA

Jacksonville
Tampa

GEORGIA

Atlanta
Columbus
Savannah

ILLINOIS

Chicago
East St. Louis

INDIANA

Evansville
Fort Wayne
South Bend

IOWA

Des Moines

MARYLAND

Baltimore

MASSACHUSETTS

Boston
Springfield
Worcester

MICHIGAN

Detroit
Lansing

MINNESOTA

Duluth
Minneapolis
St. Paul

MISSISSIPPI

Jackson

MISSOURI

Kansas City
Springfield

NEBRASKA

Omaha

NEVADA

Las Vegas

NEW JERSEY

Jersey City
Trenton

NEW MEXICO

Albuquerque

NEW YORK

Albany
Buffalo
New York
Syracuse
Yonkers

NORTH CAROLINA

Charlotte
Greensboro
Winston-Salem

OHIO

Akron
Cincinnati
Columbus
Dayton
Youngstown

OKLAHOMA

Tulsa

OREGON

Portland

PENNSYLVANIA

Erie
Harrisburg
Philadelphia
Pittsburgh

SOUTH CAROLINA

Columbia

TENNESSEE

Memphis
Nashville

TEXAS

Dallas
Fort Worth
Houston

UTAH

Salt Lake City

VIRGINIA

Hampton
Richmond
Roanoke

WASHINGTON

Spokane
Tacoma

WISCONSIN

Milwaukee

NATIONAL LEAGUE OF CITIES

UNITED STATES CONFERENCE OF MAYORS

OMB No. 51-S75079
Expires: April, 1976

* *ITALIC PRINT REPRESENTS CUMULATIVE TOTALS OR AVERAGES OF TOTAL RESPONDENTS INCLUDED IN THIS UPDATED STUDY*

SURVEY

CETA AND VOCATIONAL EDUCATION

I. GENERAL INFORMATION

1. City _____

2. State _____

3. Name of CETA Administrator _____

4. Is your City a Member of a Manpower Consortium? *43* Yes *31* No

   NOTE: If your City is a Member of a Manpower Consortium, please respond to this survey only as it relates to your City. /

II. PROGRAM ADMINISTRATION

The following questions probe the PROCEDURES that were followed to establish, fund, and operate vocational education under CETA in your area.

5. Did your State notify you of the amount of 5% funds that would be available for your City before negotiations for the non-financial agreement began?

   Yes *68* No *6*

6. Has your non-financial agreement been negotiated? If response is "No," please go on to Question 10.

   Yes *72* No *2*

7. With whom at the State level did you negotiate your non-financial agreement?

   Title *Representative of State Department of Vocational Education*

   Agency _____

1620 Eye Street, N.W., Washington D. C. 20006 / 202-293-7300

8. Was the non-financial agreement negotiated with the State to your City's satisfaction?

Yes *64* *2-no response* No *8*

9. Are the vocational education activities negotiated in your non-financial agreement incorporated into your FY 1976 Manpower Plan?

Yes *69* *2-no response* No *3*

10. What is your Title I Allocation for FY 1976? *highest- $104,515,911*
lowest - $ 76,782

11. What amount of your State's share of the 5% vocational education funds was allocated for use in your City? *highest- $ 2,982,397*
lowest - $ 25,000

12. What <u>percentage</u> of your State's total 5% funds does your City's share represent? *average - 14.56%*

13. According to CETA rules and regulations, a State is entitled to use up to 20 percent of the State allotment of 5% vocational education funds for administrative costs. What percentage of your State's 5% funds did the State use for State administrative costs?

average - 11.42%

14. For purposes of answering this Questionnaire, please use the following definitions:

SLOTS - Trainee positions to be filled.

ENROLLEES - The people who fill slots (sometimes more than one enrollee can fill a slot if, for example, a twelve month slot is filled for the first six months by one enrollee, and the second six months by another enrollee).

Through the use of the <u>five percent</u> funds only, how many enrollees were served and how many slots were created in FY 1975 and how many do you anticipate in FY 1976?

	FY 1975	FY 1976
SLOTS -	*248*	*272*
ENROLLEES -	*392*	*379*

RESPONSES ARE AVERAGES

15. Through the use of Title I funds other than the 5% set-aside, how many slots were created and how many enrollees were served?

	FY 1975	FY 1976
SLOTS -	*653*	*802*
ENROLLEES -	*1,247*	*1,498*

RESPONSES ARE AVERAGES

16. Will you use Title I funds in addition to 5% funds for vocational education training, or for supportive services to vocational education enrollees?

Yes 71 No 3

III. PROGRAM OPERATIONS

The following questions focus on the SUBSTANCE of the vocational education offerings that are provided under CETA in your locality.

17. Which agency do you use as the source of labor market projections within your planning areas for the establishment of vocational education training with CETA funds?

68 State Employment Service

29 Mayor's Manpower Office

18 Local Education Agency

19 Other (specify) *Colleges, Univeraities, Community Based Organizations, Business*

18. Please check the types of vocational education programs which are operating in your City with CETA funds.

4 Agriculture

10 Consumer and Homemaking

13 Distributive Education

60 Health Occupations

7 Occupational Home Economics

69 Office Occupations

52 Technical Education

67 Trade and Industries

19. What other services will be provided to vocational education enrollees through CETA funds?

65 Allowances

45 Child Care

30 English as a Second Language

49 GED Program

55 Transportation

32 Other (Specify) *Medical Care, Legal Assistance, Housing*

20. Who recruits and places enrollees in vocational education programs under CETA?

6 Local Education Agency

31 Mayor's Manpower Office

31 State Employment Service

23 Other (Specify) *Various Subcontractors and Community Based Organizations*

21. Who provides job placement services for those who complete vocational education programs under CETA?

13 Local Education Agency

26 Mayor's Manpower Office

40 State Employment Service

24 Other (Specify) *Various Subcontractors and Community Based Organizations*

22. On the chart below, please give the number of slots and enrollees by institution for vocational education funded under MDTA and EOA (FY '74):

	SLOTS	ENROLLEES
Community Colleges/Public Technical Institutes	1,325	4,063
Opportunities Industrialization Centers	3,663	10,808
Proprietary Schools	464	1,104
Public Secondary Schools	1,450	1,354
Skill Centers	6,961	16,000
Other (Specify)	1,764	3,235

23. On the chart below, please give the number of slots and enrollees by institution for vocational education funded under CETA (FY '76):

	SLOTS	ENROLLEES
Community Colleges/Public Technical Institutes	4,765	6,927
Opportunities Industrialization Centers	7,282	10,777
Proprietary Schools	10,102	7,691
Public Secondary Schools	2,387	2,966
Skill Centers	9,262	17,032
Other (Specify) *CBO's*	6,962	7,761

24. Do existing vocational education institution facilities in your planning area have the capacity to expand to meet the possible increase in slots occurring from vocational education activities under CETA?

Yes 72 No 2

IV. PROGRAM COORDINATION

25. Has the representation of the vocational education community on your Manpower Advisory Council -- during this fiscal year:

8 increased?

0 decreased?

66 remained the same?

26. Has your working relationship with those institutions that provide vocational education in your community?

39 become more effective in the last year?

32 remained about the same?

3 become less effective in the last year?

27. What incentives were created in your jurisdiction to bring about greater cooperation between your City as prime sponsor and vocational education communities at the State and local levels?

Increased CETA Title I funding was the most often cited, followed by the desire to serve those in need of training.

28. What, if any, are some of the problems in your jurisdiction which make it difficult to develop cooperative relationships with the vocational education system?

Differing philosophies, turfsmanship, differences in operating procedures, differing definitions of disadvantaged, working with a state rather than a local system.

29. If you are no longer funding, if you have reduced funding, or if you have increased the funding of institutions that provided vocational education under MDTA, and EOA, please explain why.

Poor performance records, lack of open-ended system, and uncooperativeness of institutional administrators for reducing or eliminating funding.

Please list the Name, Title, and Phone Number of the Individual who filled out this Survey.

NAME _____ TITLE _____

TELEPHONE NUMBER _____

APPENDIX III

THE FOLLOWING PAGES HAVE BEEN EXTRACTED FROM THE FORMS PREPARATION HANDBOOK FOR PRIME SPONSORS UNDER THE COMPREHENSIVE EMPLOYMENT AND TRAINING ACT OF 1973, U. S. DEPARTMENT OF LABOR, EMPLOYMENT AND TRAINING ADMINISTRATION, JUNE 1976.

G. Prime Sponsor/Vocational Education Non-Financial Agreement

The purpose of this agreement is to develop a financial, statistical, and narrative plan for the expenditure of vocational education funds in the prime sponsor's area.

The prime sponsor will develop its vocational education plan in conjunction with its Comprehensive Manpower Plan. The prime sponsor shall be notified of the vocational education funds available to its area by the Governor as soon as possible after the RD notifies the Governor of the amount allocated to the State. When the plan is developed, it shall be submitted to the Vocational Education Board for approval. This plan, when approved and signed, will constitute a non-financial agreement between the prime sponsor and the State Vocational Education Board. A copy of the agreement is to be sent to the Governor for inclusion in the Special Grant application. The agreement will consist of the following sections:

- Vocational Education Agreement Signature Sheet
- Section I of the Special Grant-Program Planning Summary
- Appropriate columns of the Special Grant-Budget Information Summary
- Vocational Education Program Narrative

Since this is a non-financial agreement, no money will change hands. The Vocational Education Board promises to provide the services outlined in the agreement upon receipt of the funds from the Governor.

1. Vocational Education Agreement Signature Sheet

a. Purpose. The Vocational Education Signature Sheet constitutes a legal and binding document when signed by both parties. The State Vocational Education Board is legally bound to deliver the training and services outline in the program narrative, The Special Grant-Program Planning Summary, and the Special Grant-Budget Information Summary upon receipt of the funds from the Governor. Both parties agree to operate the vocational education program in accordance with federal regulations and the non-financial agreement.

b. General Instructions. When an agreement is reached between the prime sponsor and the Vocational Education Board on the training and services to be provided, the agreement signature sheet can be signed. At least three copies of the agreement will be signed: one for each of the signing parties and one to go to the Governor. Any change to the agreement will require prior bilateral approval of both the prime sponsor and the Vocational Education Board.

c. Facsimile of Form. See the following page.

U.S. DEPARTMENT OF LABOR

VOCATIONAL EDUCATION AGREEMENT SIGNATURE SHEET

1. PRIME SPONSOR	2. VOCATIONAL EDUCATION BOARD

Pursuant to Section 112(c) of the Comprehensive Employment and Training Act of 1973, this Agreement is entered into by the State Vocational Education Board of *(3. Name of State)*..... and *(4. Name of Prime Sponsor)*.....
This Agreement consists of this sheet, the Project Operating Plan and the Program Narrative.

As per this Agreement the State Vocational Education Board of *(5. Name of State)* ..... is committed to provide for the Prime Sponsor the training and services outlined in the Program Narrative. These services and training will be provided upon receipt of funds from the Governor.

6. The estimated costs of these services and training by cost category are:

COST CATEGORY	ESTIMATED COSTS
Training	
Administration	
Allowances	
Services To Participants	
TOTAL	

7. AGREEMENT PERIOD

This non-financial agreement covers the period from..... to.....

8. APPROVED FOR THE PRIME SPONSOR BY	9. APPROVED FOR THE VOCATIONAL EDUCATION BOARD BY
NAME	NAME
TITLE	TITLE
SIGNATURE	SIGNATURE

MA 2-199C
Mar. 1978

d. Instructions for Completing the Vocational Education Agreement Signature Sheet

Item 1. Prime Sponsor

Enter the name and address of the prime sponsor in whose area the training and services will be provided.

Item 2. Vocational Education Board

Enter the name and address of the State Vocational Education Board providing the services and training.

Item 3. Enter the name of the State.

Item 4. Enter the prime sponsor's name.

Item 5. Enter the name of the State

Item 6. Enter the estimated amount of Vocational Education funds from the Governor's Special Grant which will be spent for the listed cost categories.

Item 7. Enter the period covered by the non-financial agreement.

Item 8. Enter the signature of the prime sponsor representative.

Item 9. Enter the signature of the Vocational Education Board representative.

2. Section I of the Special Grant-Program Planning Summary

The Special Grant-Program Planning Summary, used by the Governor in the Special Grant application, will also be used by the prime sponsor in the non-financial agreement. Section B of this chapter contains detailed instructions on completion of this form. Only Section I, Vocational Education Projects, will be completed by the prime sponsor for the non-financial agreement.

3. Appropriate columns of the Special Grant-Budget Information Summary

The Special Grant-Budget Inforamtion Summary, used by the Governor in the Special Grant application, will also be used by the prime sponsor in the non-financial agreement. Section C of this chapter contains detailed instructions on the completion of this form. In section F, Budget Summary Cost Categories, only the spaces marked Voc.Ed. in columns b and c, and in column f, Total, will be completed for each line. In section G, Cumulative Quarterly Projections of Obligations and Expenditures, only the appropriate lines will be completed for each column. In lines a and e only the space marked Voc. Ed. will be completed.

4. Prime Sponsor/Vocational Education Board Non-Financial Agreement Program Narrative

A detailed explanation of the following four areas will be developed by the prime sponsor for the expenditure of the Governor's Vocational Education funds available for the prime sponsor's area:

a. The training and services including basic and remedial education to be provided by the Vocational Education Board to the prime sponsor upon receipt of the necessary funds from the Governor.

b. The objectives and need for these services and training.

c. The results and benefits expected from these services and training.

d. The coordination of these services and training with the prime sponsor's CETA grant activities.

H. Quarterly Summary of Participant Characteristics

1. Purpose. This form provides information on socio-economic characteristics of participants served by the Vocational Education and State Manpower Services portions of the Governor's Special Grant. It will be used for assessment and evaluation purposes and to provide the Secretary with CETA participant characteristics information.

2. General Instructions. A separate Quarterly Summary of Participant Characteristics (QSPC) is required for the Vocational Education and State The QSPCs are to be submitted to the appropriate ETA regional office in three copies at the end of each Federal fiscal year quarter with the Special Grant-Program Status Summary. The QSPCs are due in the regional office no later than 30 days after the end of the reporting period. Entries are to be cumulative for the grant year to date. All individuals receiving training and/or services from the Vocational Education or State Manpower Services portions should be counted on the respective QSPCs, even if the participants are reported on regular prime sponsors' reports.

3. Facsimile of Form and Specific Instructions. See part D of Chapter VII.

(E 009 881